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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 FRESNO DIVISION
12

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14 MEGAN GOODEILL
on behalf of minor A.M.F.,

15
16 Plaintiff,

17 v.

18 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

19 Defendant.
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Case No. 1:21-cv-00242-BAK (SKO)

STIPULATION AND ORDER FOR EXTENSION
OF TIME TO FILE DEFENDANT'S RESPONSE
TO PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

(Doc. 29)

22 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social
23 Security (the "Commissioner"), shall have a first extension of 45 days to respond to Plaintiff's
24 Motion for Summary Judgment ("Motion") (Docket Number 27), extending the date on which
25 Defendant's response is due from August 21, 2022, to October 5, 2022.

26 Defendant needs more time to respond to Plaintiff's Motion because the undersigned
27 attorney was recently reassigned to this case and needs more time review the record, evaluate the
28 issues raised in Plaintiff's Motion, determine whether options exist for settlement, and if not,

1 prepare Defendant's Opposition to Plaintiff's Motion. In addition, the undersigned attorney for
2 Defendant currently has eight district court briefs due over the next four weeks, including
3 Defendant's Opposition in this case.

4 Due to the overall volume of work within the Commissioner's Region IX Office of
5 General Counsel, neither the undersigned attorney nor another attorney in the Region IX Office
6 anticipate being able to review and respond to Plaintiff's Motion by the current due date. Current
7 staffing limitations caused by planned and unplanned leave of multiple attorneys make immediate
8 reassignment impractical. Accordingly, the Commissioner respectfully requests an extension of
9 45 days, until October 5, 2022, to respond to Plaintiff's Motion.

10 This request is made in good faith and is not intended to delay the proceedings in this
11 matter.

12 Respectfully submitted,

13 DATE: August 18, 2022

14 /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorney for Plaintiff
15 (as approved via email)

16 PHILLIP A. TALBERT
United States Attorney
17 PETER THOMPSON
Acting Regional Chief Counsel, Region IX
18 Social Security Administration

19 DATE: August 18, 2022

20 By /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
21 Special Assistant United States Attorney
Attorneys for Defendant
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ORDER

Based upon the foregoing stipulation of the parties (Doc. 29), and for good cause shown, Fed. R. Civ. P. 16(b)(4), IT IS HEREBY ORDERED that Defendant shall have an extension of time, to and including October 5, 2022, in which to file a response to Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 21) shall be extended accordingly.

IT IS SO ORDERED.

Dated: August 19, 2022

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE